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Attorneys for Debtor,
SOUTHERN INYO HEALTHCARE DISTRICT

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

SOUTHERN INYO HEALTHCARE
DISTRICT,

Debtor.

Case No.: 2016-10015

Chapter 9

FL-003

Date: N/A

Time: N/A

Place: Dept. A, Ctrm 11
U.S. Bankruptcy Court
2500 Tulare Street
Fresno, CA 93721

**DECLARATION OF ASHLEY M. MCDOW IN SUPPORT OF DEBTOR'S EX PARTE
MOTION TO FILE DOCUMENTS UNDER SEAL RELATING TO
MOTION TO DISQUALIFY ASHLEY M. MCDOW AND
FOLEY & LARDNER AS ATTORNEYS FOR DEBTOR**

I, the undersigned, hereby declare as follows:

1. I am licensed to practice law in California. I am admitted to practice before the United States District Court of the Eastern District of California. I am an attorney with Foley & Lardner LLP, counsel for Southern Inyo Healthcare District, in relation to the Motion to Disqualify Ashley M. McDow and Foley & Lardner as Attorneys for the Debtor (the "Motion").

2. I have personal knowledge of the matters stated in this declaration. If the Court or a party called on me to do so, I could and would competently testify to these facts under oath.

1 I submit this declaration in support of the Ex Parte Motion to File Documents under Seal Relating to
2 the Motion.

3 3. The Debtor will be filing an Objection (the "Objection") to the Motion on or about
4 February 20, 2019, as provided in this Court's Corrected Order dated January 14, 2019 [Doc No.
5 568]. In support of the Objection, the Debtor will be submitting legal invoices generated by Baker &
6 Hostetler ("Invoices"), which I understand Healthcare Conglomerates Associates, LLC and Vi
7 Healthcare Finance, Inc. (collectively, the "Movants") assert contain attorney-client privileged and/or
8 confidential information. In order to preserve any attorney-client privileged and/or confidential
9 information in those documents, and pursuant to this Court's order at the December 19, 2018 hearing
10 in this matter, the Debtor respectfully requests that it be permitted to file the Invoices under seal.
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12 I declare under penalty of perjury that the foregoing statements are true and correct and that if
13 called as a witness herein I could and would competently testify thereto, and that this declaration was
14 executed on February 15, 2019 at San Francisco, California.
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16 /s/ Ashley M. McDow

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